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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,)
18 Plaintiff,)
19 v.)
20 MICHAEL EDISON,)
Defendant.)

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**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME**

22 The above-captioned matter came before the Court on July 24, 2007, to address issues
23 related to the fact that the defendant's wife, Debra Edison, has been charged with obstruction of
24 justice in relation with this case (Case # CR 07-0479 JSW). The defendant was represented by
25 Michael Thorman, Esq., and the government was represented by Jeffrey Finigan, Assistant
26 United States Attorney. The matter was set before Magistrate James Larson on July 25, 2007, for
27 appointment of CJAA co-counsel, assuming the defendant qualifies, and status before this Court
28 on August 16, 2007, at 3:30 p.m.

STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME
CR 07-0074 WHA

1 In addition to the existing time exclusion already in place for this time period, the Court
 2 made a finding that the time from and including July 24, 2007, through and including August 16,
 3 2007, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), because the
 4 ends of justice served by taking such action outweighed the best interest of the public and the
 5 defendant in a speedy trial. The finding was based on the unsettled status of the defendant's legal
 6 representation in light of his wife's case and the need for the defendant to have reasonable time
 7 necessary for effective preparation, taking into account the exercise of due diligence, and for
 8 continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

9 The parties hereby agree to and request that the case be continued until August 16, 2007,
 10 and that the exclusion of time until then be granted. The parties agree and stipulate that the
 11 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),
 12 because the ends of justice served by this continuance outweigh the best interest of the public and
 13 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively
 14 prepare, taking into account the exercise of due diligence, and will provide for continuity of
 15 counsel for the defendant.

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 17 DATED: July 26, 2007

/s/

MICHAEL THORMAN
 Counsel for Michael Edison

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 20 DATED: July 24, 2007

/s/

JEFFREY R. FINIGAN
 Assistant U.S. Attorney

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 22 So ordered.

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 24 DATED: July 30, 2007

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 28 WILLIAM A. ALSUP
 UNITED STATES DISTRICT COURT JUDGE

